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May 2, 2024

VIA ELECTRONIC FILING

Honorable Paul J. Oetken
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: US v. Greenberg, 21 Cr. 92 (A.F.N) (JPO)

Honorable Judge Oetken:

Counsel for Julia Greenberg respectfully submits this letter to request that this Honorable Court grant Ms. Greenberg permission to travel internationally to Belarus to this June to for the purpose of visiting her elderly father and dealing with business matters.

While the precise dates of the trip will depend on ticket prices, she is seeking to depart during the month of June for a three- to four-week trip to Belarus. She will fly into Warsaw, Poland, and travel by train to Brest, Belarus (an approximately two-hour train ride). She will stay with her father in Brest for the duration of the trip.

The primary purpose Ms. Greenberg's proposed travel is to visit her 80-year-old father, who had been dealing with some health issues. Prior to the COVID-19 pandemic, Ms. Greenberg would visit her father in Belarus at least once per year. However, due to the pandemic and this case, she has been unable to visit her father for five years. During that time, Ms. Greenberg's father has suffered a heart attack and lost his wife (Ms. Greenberg's stepmother) to a stroke. Ms. Greenberg has expresses concerns that, given her father's advanced aged and health issues, she might not have many more opportunities to see him.

While in Belarus, Ms. Greenberg also intends to handle some business matters relating to a sustainable clothing line she started. The business aspects of the trip will involve meeting with a friend who owns a clothing factory in Belarus and having a photoshoot for her clothing line's website.

It is my understanding that the Probation Office, through Probation Officer Lisa Famularo, has indicated that it would consent to three weeks of international travel. Additionally, the Government, through Assistant US Attorney Jonathan Rebold, has indicated that it defers to the Probation Office on Ms. Greenberg's request.

Ms. Greenberg's history of compliance while on pretrial release demonstrates that her travel poses no risk of noncompliance with the terms of her release. As such, she respectfully asks this Honorable Court to grant her request.

Thank you for your time and attention in this matter.

Respectfully Submitted,

By: /s/ Beau B. Brindley
Beau B. Brindley
Attorney for Julia Greenberg

CC: All Parties (via ECF)
USPO Lisa Famularo – Lisa_Famularo@nyep.uscourts.gov

Defendant's request for international travel for a time period of up to three weeks to commence during the month of June is hereby granted. Defendant is to provide an itinerary to the probation department and provide any additional information that the probation department requests for the trip.

So ordered.

5/3/2024



J. PAUL OETKEN
United States District Judge